

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

SAFET DEARI,

Plaintiff,

v.

Case No.

CLIENT SERVICES INC.,

Defendant.

NOTICE OF REMOVAL

Defendant, Client Services Inc. (“Defendant”), by its attorneys, von Briesen & Roper, s.c., hereby gives notice of the removal of this civil action from the Circuit Court of Kenosha County, Wisconsin, to the United States District Court for the Eastern District of Wisconsin. This Notice of Removal is filed pursuant to 28 U.S.C. §§ 1441(a), 1446, and 1453. As grounds for removal, defendant states as follows:

1. Plaintiff Safet Deari (“Plaintiff”) filed his Complaint on March 19, 2021, in the Circuit Court of Kenosha County, State of Wisconsin located at the Kenosha County Courthouse, 912 56th Street, Kenosha, WI 53140. The case was assigned Case No. 21-CV-237.
2. This is a civil action based on Plaintiff’s contentions that Defendant has violated the Fair Debt Collection Practices Act, 15 U.S.C. § 1692, *et seq.* (“FDCPA”).
3. Removal is proper because this case involves a federal question – alleged violations of the FDCPA. Therefore, the entire suit is removable under 28 U.S.C. § 1441(a).
4. Removal is timely pursuant to 28 U.S.C. § 1446(b) because Defendant has filed this Notice of Removal within 30 days of receipt of Plaintiff’s Complaint. Plaintiff served a copy of the Complaint upon Defendant on April 7, 2021.

5. Venue is proper in this district under 28 U.S.C. § 1441(a) because the state court where the suit has been pending is located in this district.

6. Removal is timely pursuant to 28 U.S.C. § 1441(b) because defendant has filed its Notice of Removal within 30 days of receipt of plaintiff's state-court complaint which was served on April 8, 2021. Attached hereto as **Exhibit A** is a copy of defendant's Acceptance of Service.

7. Pursuant to 28 U.S.C. § 1446(a), copies of all process, pleadings, orders and other papers filed in this action and obtained by Defendant are attached hereto and marked as composite **Exhibit B** and incorporated herein by reference.

8. Notice of this removal will be promptly filed with the Circuit Court of Kenosha County, State of Wisconsin and be served on all adverse parties.

9. Pursuant to 28 U.S.C. § 1446(d), defendant has given written notice of the filing of this Notice of Removal to plaintiff and will file a copy of this Notice of Removal with the Clerk of the Circuit Court of Kenosha County, Wisconsin. A copy of the Notice of Filing of Removal to be filed in the Circuit Court of Kenosha County, Wisconsin is attached as **Exhibit C**. A file-stamped copy of the Notice of Filing of Removal filed by defendant in the Circuit Court of Kenosha County, Wisconsin will be filed with this Court when received by defendant.

10. Plaintiff requested a jury trial in state court.

11. By filing this Removal, defendant does not waive any rights, defenses, claims or arguments.

WHEREFORE, this Court has jurisdiction pursuant to 28 U.S.C. § 1331, based on the federal questions presented in plaintiff's complaint, and removal pursuant to 28 U.S.C. §§ 1441(a), 1446, and 1453 is appropriate.

For the above reasons Defendant requests that this Court assume full jurisdiction over the proceeding as provided by law.

Dated this 30th day of April, 2021.

von BRIESEN & ROPER, s.c.
Attorneys for Defendant, Client Services Inc.

By: Electronically signed by Terry E. Johnson

Terry E. Johnson, SBN 1016704

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